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Proposed Liaison Counsel for Proposed Lead Plaintiffs

[Additional Counsel Appear on Signature Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

E-FILED - 2/7/07

13 HARRIET GOLDSTEIN, Individually and on) Case No. C-06-06286 RMW
14 Behalf of All Others Similarly Situated,)
15 Plaintiff,) CLASS ACTION ***AMENDED***
16 vs.) STIPULATION AND [] ORDER
17 SEHAT SUTARDJA, WEILI DAI, PANTAS) CONSOLIDATING RELATED ACTIONS,
SUTARDJA, GEORGE A. HERVEY, and) APPOINTING LEAD PLAINTIFFS AND
MARVELL TECHNOLOGY GROUP, LTD.,) APPROVING SELECTION OF LEAD
18 Defendants.) COUNSEL
19) DATE: January 26, 2007
20) TIME: 9:00 a.m.
21) CTRM: 6

22 CARTER BRANTNER, Individually and on) Case No. C-06-06441 SI
23 Behalf of All Others Similarly Situated,)
24 Plaintiff,)
25 vs.)
26 MARVELL TECHNOLOGY GROUP, LTD.,)
SEHAT SUTARDJA and GEORGE A.)
HERVEY,)
27 Defendants.)
28 [Captions Continued on Next Page])

[C-06-06286 RMW] STIPULATION AND [] ORDER CONSOLIDATING
RELATED ACTIONS, APPOINTING LEAD PLAINTIFFS AND APPROVING SELECTION
OF LEAD COUNSEL

TIMOTHY MAHRT, Individually and on) Case No. C-06-06731 SBA
Behalf of All Others Similarly Situated,)

Plaintiff,
)

VS.

SEHAT SUTARDJA, WEILI DAI, PANTAS
SUTARDAJA, GEORGE A. HERVEY and
MARVELL TECHNOLOGY GROUP, LTD.,

Defendants.

SHAWN M. PERRY, Individually and on) Case No. C-06-07039 JSW
Behalf of All Others Similarly Situated,)

Plaintiff,

vs.

MARVELL TECHNOLOGY GROUP, LTD.,
SEHAT SUTARDJA, WEILI DAI, PANTAS
SUTARDJA and GEORGE A. HERVEY.

Defendants

WHEREAS, seven separate Lead Plaintiff motions were filed in connection with these actions. Five have been withdrawn, which leaves only two Lead Plaintiff motions, which were filed by: (1) the Police and Fire Retirement System of the City of Detroit (“PFRS”); and (2) Monte Paschi Assert Management S.G.R. S.p.A., Puerto Rico Government Employees Retirement System, Laborers District Council Construction Industry Pension Fund, Bucks County Retirement Board, and Southeastern Pennsylvania Transportation Authority (collectively referred to in the papers as the “Marvell Institutional Investor Group”).

WHEREAS, PFRS and the Marvell Institutional Investor Group have now jointly moved the Court for an Order consolidating actions, appointing both PFRS and two members of the Marvell Institutional Investor Group, Monte Paschi Asset Management S.G.R. S.p.A. (“Monte Paschi”) and Puerto Rico Government Employees Retirement System (“PRGERS”), as Lead Plaintiffs and approving Kohn, Swift & Graf, P.C. and Schiffrin, Barroway, Topaz & Kessler LLP

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1 as Co-Lead Counsel, and Berman DeValerio Pease Tabacco Burt & Pucillo as Liaison Counsel.

2 Therefore, IT IS HEREBY STIPULATED AND AGREED by the remaining Lead Plaintiff
 3 movants, through their respective counsel of record, as follows:

4 **I. CONSOLIDATION**

5 1. Pursuant to Federal Rule of Civil Procedure 42 and § 78u-4(a)(3)(B)(ii) of the
 6 Exchange Act, as amended by the Private Securities Litigation Reform Act of 1995 (“PSLRA”),
 7 the following actions are hereby consolidated for all purposes into one action:

Name & Case No.	Date Complaint Filed	Judge Assigned
Goldstein v. Sehat Sutardja, et al., 3:06-cv-06286-RMW	October 5, 2006	Honorable Ronald M. Whyte
Brantner v. Marvell Technology Group, Ltd., et al., 3:06-cv-06441-SI	October 16, 2006	Honorable Susan Illston
Mahrt v. Sehat Sutardja, et al., 4:06-cv-06731-SBI	October 30, 2006	Honorable Saundra B. Armstrong
Perry v. Marvell Technology Group Ltd., et al., 3:06-cv-07039-JSW	November 13, 2006	Honorable Jeffrey S. White

18 2. These actions shall be referred to as the “Consolidated Action.” This Stipulation
 19 and Order shall apply to the Consolidated Action and to each case that is subsequently filed in this
 20 Court or transferred to this Court that relates to the same subject matter as in the Consolidated
 21 Action.

1 3. Every pleading in this Consolidated Action shall bear the following caption:

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

In re Marvell Technology Group, Ltd. Securities Litigation

Master File No. 06-06286 RMW

THIS DOCUMENT RELATES TO:

CLASS ACTION

[TITLE OF DOCUMENT]

4. When the document being filed pertains to all actions, the phrase "All Actions" shall appear immediately after the phrase "This Document Relates To:". When a document applies to some, but not all, of the actions, the document shall list, immediately after the phrase "This Document Relates To:", the docket number for each individual action to which the document applies, along with the name of the first-listed plaintiff in said action.

5. This Court requests the assistance of counsel in calling to the attention of the Clerk of this Court the filing or transfer of any case which might properly be consolidated as part of this Consolidated Action.

II. MASTER DOCKET AND MASTER FILE

6. A Master Docket and Master File shall be established for the Consolidated Action. The Master File shall be No. C-06-06286 RMW. All orders, pleadings, motions and other documents shall, when filed and docketed in the Master File, be deemed filed and docketed in each individual case to the extent applicable. When an order, pleading, motion or document is filed with a caption indicating that it is applicable to fewer than all of these consolidated action, the Clerk shall file such pleadings in the Master File and note such filing in the Master Docket and in the docket of each action referenced.

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1 **III. NEWLY-FILED OR TRANSFERRED ACTIONS**

2 7. When a case that arises out of the subject matter of this action is hereinafter filed in
3 this Court or transferred to this Court from another court, the Clerk of this Court shall:

- 4 a. file a copy of this Order in the separate file for such action;
5 b. mail a copy of this Order to the attorneys for the plaintiff(s) in the newly
6 filed or transferred case and to any new defendant(s) in the newly filed or transferred case; and
7 c. make the appropriate entry in the docket for this action.

8 8. Each new case which arises out of the subject matter of this Consolidated Action
9 that is filed in this Court or transferred to this Court shall be consolidated with this action and this
10 Order shall apply thereto, unless a party objecting to this Order or any provision of this Order
11 shall, within ten (10) days after the date upon which a copy of this Order is served on counsel for
12 such party, files an application for relief from this Order or any provision herein and this Court
13 deems it appropriate to grant such application.

14 **IV. APPOINTMENT OF LEAD PLAINTIFFS AND LEAD AND LIAISON COUNSEL**

15 9. Proposed lead plaintiffs PFRS, Monte Paschi and PRGERS have the largest
16 financial interest in the relief sought by the class and, together, satisfy the requirements of Rule 23
17 of the Federal Rules of Civil Procedure. Accordingly, pursuant to § 21D(a)(3)(B)(iii) of the
18 PSLRA, 15 U.S.C. § 78u-4(a)(3)(B)(iii), PFRS, Monte Paschi and PRGERS shall be appointed as
19 Lead Plaintiffs.

20 10. Lead Plaintiffs have selected Kohn, Swift & Graf P.C. and Schiffriin, Barroway,
21 Topaz & Kessler, LLP as proposed Co-Lead Counsel and Berman DeValerio Pease Tabacco Burt
22 & Pucillo as proposed Liaison Counsel. These law firms have the requisite experience and
23 expertise to lead this litigation on behalf of the putative class. Accordingly, pursuant to §
24 21D(a)(3)(B)(v) of the PSLRA, 15 U.S.C. § 78u-4(a)(3)(B)(v), Kohn, Swift & Graf P.C. and
25 Schiffriin, Barroway, Topaz & Kessler, LLP are approved as Co-Lead Counsel and Berman
26 DeValerio Pease Tabacco Burt & Pucillo is approved as Liaison Counsel. Counsel are to avoid
27 duplication of services. *(rmw)*

28 11. Co-Lead Counsel shall have the following responsibilities and duties, which are to
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OF LEAD COUNSEL

1 be carried out either personally or through counsel whom Co-Lead Counsel shall designate:

- 2 a. to coordinate the briefing and argument of any and all motions;
- 3 b. to coordinate the conduct of any and all discovery proceedings;
- 4 c. to coordinate the examination of any and all witnesses in depositions;
- 5 d. to coordinate the selection of counsel to act as spokesperson at all pretrial
conferences;
- 6 e. to call meetings of the plaintiffs' counsel as they deem necessary and
appropriate from time to time;
- 7 f. to coordinate all settlement negotiations with counsel for defendants;
- 8 g. to coordinate and direct the pretrial discovery proceedings and the
preparation for trial and the trial of this matter and to delegate work responsibilities to selected
counsel as may be required;
- 9 h. to coordinate the preparation and filings of all pleadings; and
- 10 i. to supervise all other matters concerning the prosecution or resolution of the
11 Consolidated Action.

12. Additionally, Co-Lead Counsel, assisted by Liaison Counsel, shall facilitate
communications with the Court on behalf of plaintiffs' counsel and assist in coordination of
plaintiffs' counsel's prosecution of the case.

13. No motion, discovery request or other pretrial proceedings shall be initiated or filed
by any plaintiffs without the approval of Co-Lead Counsel, so as to prevent duplicative pleadings
or discovery by plaintiffs. No settlement negotiations shall be conducted without the approval of
Co-Lead Counsel.

14. Co-Lead Counsel, assisted by Liaison Counsel, shall have the responsibility of
receiving and disseminating Court orders and notices.

15. Co-Lead Counsel shall be the contact between plaintiffs' counsel and defendants'
counsel, as well as the spokespersons for all plaintiffs' counsel, and shall direct and coordinate the
activities of plaintiffs' counsel.

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2 ***Item 16 removed by the Court. (rmw)***
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5 Dated: January 25, 2007
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**BERMAN DeVALERIO PEASE TABACCO
BURT & PUCILLO**

8
9 By: /s/ Nicole Lavallee
10 NICOLE LAVALLEE
11

Joseph J. Tabacco, Jr.
Christopher T. Heffelfinger
James Magid
425 California Street, Suite 2100
San Francisco, CA 94104
Telephone: (415) 433-3200

12 **Proposed Liaison Counsel for Proposed Lead Plaintiffs**
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I, Nicole Lavallee, am the ECF User whose ID and password are being used to file this
Stipulation and [Proposed] Order . In compliance with General Order 45, X.B., I hereby attest that
Denis F. Sheils, Stuart L. Berman, and Bradley E. Beckworth have concurred in this filing.

14 Dated: January 25, 2007
15

KOHN, SWIFT & GRAF, P.C.

16 By: /s/ Denis F. Sheils
17 DENIS F. SHEILS
18

Joseph C. Kohn
William E. Hoese
One South Broad Street, Suite 2100
Philadelphia, PA 19107
Telephone: (215) 238-1700

19 **Proposed Co-Lead Counsel**
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RELATED ACTIONS, APPOINTING LEAD PLAINTIFFS AND APPROVING SELECTION
OF LEAD COUNSEL

1 Dated: January 25, 2007

2
3
4
SCHIFFRIN, BARROWAY, TOPAZ
& KESSLER, LLP

5 By: /s/ Stuart L. Berman
6 STUART L. BERMAN

7 Sean M. Handler
8 Nicolette Tropiano
9 280 King of Prussia Road
10 Radnor, PA 19087
11 Telephone: (610) 667-7706

12 **Proposed Co-Lead Counsel**

13 Dated: January 25, 2007

14 **NIX PATTERSON & ROACH, LLP**

15 By: /s/ Bradley E. Beckworth
16 BRADLEY E. BECKWORTH

17 Jeffrey J. Angelovich
18 205 Linda Drive
19 Daingerfield, TX 75638
20 Telephone: (903) 645-7333

21 **Additional Counsel for Proposed Lead Plaintiffs**

22 * * * *

23 **[] ORDER**

24 **IT IS SO ORDERED.**

25 Dated: 2/7, 2007

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28 
The Honorable Ronald M. Whyte
United States District Judge